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and OTTOMOTTO LLC

16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 Plaintiff,

21 v.

22 UBER TECHNOLOGIES, INC.,  
23 OTTOMOTTO LLC; OTTO TRUCKING LLC,

24 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF ARTURO J.  
GONZÁLEZ IN SUPPORT OF UBER  
TECHNOLOGIES, INC.,  
OTTOMOTTO LLC, AND OTTO  
TRUCKING LLC'S  
ADMINISTRATIVE MOTION TO  
FILE DOCUMENTS UNDER SEAL**

Trial Date: October 2, 2017

1 I, Arturo J. González, declare as follows:

2 1. I am a partner with the law firm of Morrison & Foerster LLP. I am a member in  
3 good standing of the Bar of the State of California. I make this declaration based on personal  
4 knowledge and, if called as a witness, I could and would testify competently to the matters set  
5 forth herein. I make this declaration in support of Defendants' Administrative Motion to File  
6 Documents Under Seal.

7 2. Defendants submit this motion for an order to file under seal the confidential,  
8 unredacted versions of the following documents:

- 9 • Portions of Defendants' Motion to Compel Arbitration of, and to Stay, Trade  
10 Secret and UCL Claims ("Motion"); and
- 11 • Portions of the Declaration of Arturo J. González ("González Declaration");
- 12 • Entirety of Exhibits 1-2 of the González Declaration.

13 3. The redacted portions of Defendants' Motion, the redacted portions of the  
14 González Declaration, and the entirety of Exhibits 1-2 to the González Declaration discuss  
15 confidential information relating to employment agreements and certain confidential proceedings  
16 between Plaintiff Waymo LLC ("Waymo") and two of its former employees.

17 4. Waymo has indicated that this information is confidential to Waymo, and has  
18 produced some of these employment agreements under the designation "Highly Confidential –  
19 Attorneys' Eyes Only."

20 5. Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the  
21 documents at issue, with accompanying chamber copies.

22 6. The requested time modification would have no effect on any other deadlines in  
23 the case.

24 7. Defendants met and conferred with Waymo regarding the Administrative Motion  
25 to File Documents Under Seal on March 27, 2017. Defendants agreed that they will file the  
26 aforementioned documents under seal, without a stipulation, and Waymo will file a declaration to  
27 support sealing all or portions of the documents.

1 I declare under the penalty of perjury under the laws of the United States that the  
2 foregoing is true and correct. Executed this 27rd day of March, 2017, in San Francisco,  
3 California

4  
5 /s/ Arturo J. González,  
ARTURO J. GONZÁLEZ  
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